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December 8, 2020

Via: CM/ECF Filing

Honorable Kenneth M. Karas
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601-4150

**Re: Vertime B.V. v. New Dover Group, Ltd., No. 7:17-cv-03844
Bankruptcy Update**

Dear Judge Karas,

I write pursuant to the Court's request for a status update concerning the status of Defendant New Dover Group, Ltd's bankruptcy. This letter supplements my September 18, 2020 correspondence.

On October 2, 2020, following an auction process, the Bankruptcy Court authorized the Trustee to sell to Vertime New Dover's purported claims against Vertime. That sale was completed shortly thereafter. As of November 25, 2020, the Trustee abandoned New Dover's inventory of watches other than Vertime watches to New Dover's largest secured creditor, M&T Bank, pursuant to M&T Bank's security interest. Finally, the Bankruptcy Court has set February 1, 2021 as the deadline by which all administrative proofs of claim must be filed.

There have been no other significant developments since that time with regard to progress toward a conclusion of the Bankruptcy or with regard to the Bankruptcy's impact on this case. If it pleases the Court, I will provide another update in approximately two months, on or about February 8, 2021, or sooner if there are any significant developments relevant to this case.

Very truly yours,
/s/ Todd R. Michaelis (TM6839)

CC via CM/ECF:
Jonathan Ross (counsel for NDG)
Avram Frisch (counsel for Fischer-Stuhrling)